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Attorney for Plaintiffs
JAMES MCGIBNEY
VIAVIEW, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JAMES MCGIBNEY, an individual, and
VIAVIEW, INC, a corporation,

Plaintiffs,

vs.

THOMAS RETZLAFF, an individual,
NEAL RAUHAUSER, an individual,
LANE LIPTON, an individual, and
DOES 1-5, individuals whose true names are not
known,

Defendants.

Case No.: 5:14-cv-01059 BLF

**DECLARATION OF BRITTANY RETZLAFF
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT THOMAS
RETZLAFF'S MOTION TO STRIKE**

I, BRITTANY RETZLAFF, declare the following under penalty of perjury:

1. I am the daughter of Defendant Thomas Retzlaff, I currently live in Peru.
2. Mr. Retzlaff is my father, he currently resides in Phoenix, Arizona.
3. I have been volunteering my time for the past year, working with James McGibney, who is the founder of Bullyville.com.
4. I first became aware of Bullyville when I read an article that was posted about my father on www.thomasretzlaff.com and www.bullyville.com.

- 1 5. The article identified numerous female victims who have been stalked by my father, including
2 myself. I can attest to the stalking that I have endured at the hands of my father and that of a female
3 school teacher in Texas, who is a friend of mine.
- 4 6. When I visited (and stayed) with my father at his apartment in San Antonio, TX, after he was
5 released from prison, he took naked photos of me without my knowledge and/or consent.
- 6 7. I know that he took those photos because he initially uploaded all of these images to the web without
7 cropping out the background.
- 8 8. Within the background images, it was clear to see, and identify, the bathroom in the photos, which
9 was his apartment bathroom.
- 10 9. Shortly thereafter I went to file a police report about this incident and also went to the FBI.
- 11 10. Once my father found out that I had clearly identified the background within the photos as his
12 apartment, new images were uploaded where the background of the bathroom was edited out.
- 13 11. Mr. McGibney, along with Detectives working this case in San Antonio, TX and San Jose, CA, as
14 well as the FBI, have both sets of images. My father has given multiple versions of how those naked
15 images of myself ended up online. His first version was that my ex-husband posted them. My
16 father's second version was that different men uploaded them. His latest version is that James
17 McGibney uploaded them. These images were posted by my father back in 2009. James McGibney
18 didn't even launch an of his "Ville" websites until 2011. My father, Thomas Retzlaff posted those
19 images of me all over the web and wrote many of the horrific comments beneath each image. Within
20 one email sent to my current husband, he admitted to sending links of these images to my family,
21 friends and fellow religious members in order to "embarrass me".
- 22 12. My father also admitted to me that he created a social media account under my name on "Facebook"
23 without my permission. It contained obscene sexual language and racial slurs with my former
24 employers/company name. He said he would delete it, but since my initial request, and despite my
25 several requests to Facebook, the account keeps getting reopened without my permission, by my
26 father.
- 27 13. I currently have a permanent restraining order in place against my father; however, he continues to
28 violate the restraining order by sending me emails from retzlaff@texas.net.
14. When I lived in Santa Teresa, NM, my father stationed his car outside our home and was relentlessly
stalking and harassing me.

15. When I would visit my mother in Phoenix, AZ he would station his vehicle outside of the residence for extended periods of time. He would call the house phone and ring the doorbell repeatedly. I called the El Mirage Police department due to his constant presence at the house.
16. I'm currently living in Peru and am terrified about coming back to the United States. My father has stated numerous times that if I ever step foot in the United States that he would kill me.
17. I have been forwarding every email he sends to me directly to James McGibney from BullyVille and to the FBI, and in most instances, I also forward the IP headers attached to each email sent to me by my father. An IP header is a prefix to an IP Packet which contains information about the IP version, source IP, destination IP, etc.
18. I've forwarded approximately 75 emails that were sent to me by my father from retzlaff@texas.net and dean714@vandex.com directly to James McGibney and the FBI.
19. These e-mails are attached as Exhibit 1. I have reviewed this exhibit. It contains true and correct copies of those e-mails I forwarded to Mr. McGibney and the FBI. I know that dean714@vandex.com who refers to himself as "Dean Anderson" is my father. He emailed me specifically to an email account that was never public knowledge. And the writing style and content is nearly identical to that of the emails that I've received from retzlaff@texas.net, which is my father. My father has stalked me for most of my adult life and as a child I have been a victim of his physical and emotional abuse and his numerous sexual advances towards me. Even as an adult, he has made comments to me such as "you look so pretty today, if you weren't my daughter..." Based on my past personal experiences with my father, there is no doubt in my mind, that my father, Thomas Retzlaff, is a pedophile.
20. My father not only harassed and stalked me, he would harass any employer of mine, and post horrible things about them all over the web. In addition, he would arrive at my workplace unannounced and would prevent me from leaving the parking lot by blocking my vehicle with his.
21. If necessary, I intend to testify on behalf of the Plaintiff in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge. Executed in Lima Peru on this 27th day of October 2014.


Brittany Retzlaff